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From: <John.Patterson@mail.state.ky.us>
To: K1DOM.K1PO1(BKENNARD,MSALAS),K4DOM.K4PO2(SNESS,MPO...
Date: Wed, Nov 10, 1999 11:04 AM
Subject: wireless E9-1-1 & cost recovery

To: Chairman Bill Kennard -
 * Commissioner Susan Ness -
 * Commissioner Harold Furchtgott-Roth -
 * Commissioner Michael Powell -
 * Commissioner Gloria Tristani -
 * Thomas Sugrue, Chief of the Wireless Telecommunications Bureau -
 * Magalie Roman Salas, Secretary of the FCC:

94-102

Kentucky's public safety community and CMRS Board urge the FCC to dismiss APCO's idea as unrealistic, poorly thought out, and not reflective of the desires of its constituents.

Having served as the Kentucky Chapter President of APCO from October, 1998 through August, 1999, and as a member of the joint Executive Council for Kentucky Chapters of NENA and APCO over the last three years, I can authoritatively state that the public safety community in Kentucky feels that the cost recovery requirement in 94-102 ~~has~~ in NO WAY IMPEDED the establishment of wireless E9-1-1 in Kentucky. In fact, just the opposite is true. The effort to meet 94-102's requirements has fostered the very elements of cooperation and coordination necessary to integrate wireless technology into the existing E9-1-1 network. I am very surprised that APCO International would make such a proposal and undermine all the hard work that many of us have done at the state and local levels.

The FCC was quite correct to issue its order and push the industry and public safety entities into action. However, perhaps the FCC is now naive if it believes that local and state governments were prepared and able to move more quickly on this issue. Through no lack of desire, Kentucky has moved about as quickly as it could by:

* beginning in the fall of '96, we solicited grassroots input and support, testified before committees, and drafted a statute;

* Kentucky's Legislature at its next meeting in January, 1998 passed the statute adopting a statewide model for coordination and implementation of wireless E9-1-1;

* the Governor after the passage of the statute took only two months to appoint a board of able and willing participants from the public safety and telecommunications communities;

* Kentucky's newly created CMRS Board took only 10 additional months to organize itself, adopt regulations, establish the required accounting procedures, and hire staff.

Consider the alternative - how long would it have taken for carriers and PSAPs to establish the coordination, determine who will pay for what, and accomplish the true objective (wireless E9-1-1 service to citizens) without the statewide coordination required to satisfy the cost recovery mandate? Large urban centers might get this done quickly, but they have the staff able to evaluate technology and negotiate with multiple carriers. What about rural America?

* Did the FCC in the age of universal access intend that small communities have no voice?

* How will they evaluate the complex technologies involved?

* How will they negotiate with the potentially eight carriers licensed to operate in their communities?

* Who will provide the coordination needed to work with multiple

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carriers and multiple PSAPs?

We feel that the focus and coordination required to establish adequate cost recovery has driven the creation of the only realistic model capable of accomplishing the FCC's larger objective, i.e., implementing E9-1-1 for wireless consumers. Creating adequate cost recovery has spurred the E9-1-1 community in Kentucky into action. The tasks of establishing cost recovery and ensuring that PSAPs are able to handle the required data stream have provided opportunity to not only create a framework for building a wireless E9-1-1 network as intended by the FCC, but also created a mechanism which on an ongoing basis will help to:

- * ensure the seamless integration of wireline and wireless E9-1-1;
- * inventory and evaluate the 9-1-1 infrastructure in the state;
- * establish and adopt minimum standards for 9-1-1;
- * improve the interoperability of communications networks between public safety agencies in the state;
- * establish a funding mechanism that will bridge the coming decade's predicted decline in wireline's support of E9-1-1;
- * spur upgrades of PSAP technology that enhance a center's ability to meet the challenges presented by number portability, competitive access, and PBX;
- * and finally to build a foundation for 9-1-1 that will carry it into the next millennium.

Now that Kentucky is ready to approve cost recovery plans, to evaluate PSAPs, and implement wireless E9-1-1 across the Commonwealth, surely the FCC will not seriously consider abandoning its plan. We are appalled that APCO has asked the FCC to take this drastic step.

John J. Patterson, ENP
CMRS Administrator
100 Fair Oaks Lane Suite 102 A
Frankfort, KY 40601
502 564 2638
John.Patterson@mail.state.ky.us